

1 Honorable Ricardo Martinez
2
3
4
5

6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

8 ROMELIA PEREZ,
9 Plaintiff,
10 v.
11 AMERICAN FAMILY INSURANCE
12 COMPANY,
13 Defendant.

No. 2:20-cv-00849-RSM
STIPULATION AND ORDER
CONTINUING CERTAIN PRETRIAL
DEADLINES

NOTE ON MOTION CALENDAR:
February 18, 2021

CLERK'S ACTION REQUIRED

15 **I. STIPULATION**

16 The parties to this action, by and through the undersigned counsel, hereby stipulate to
17 extend the deadlines for expert disclosure, discovery, and dispositive motions. Good cause exists
18 to continue these deadlines because two discovery motions are pending before the Court related
19 to defendant's Fed. R. Civ. P. 30(b)(6) deposition and because the adjuster working on plaintiff's
20 claim is currently on family leave and unable to appear for his deposition at this time. The parties
21 ask the deadlines to be amended as follows to accommodate time for the parties' experts to
22 provide complete opinions and to allow time for discovery:

24 Expert witness disclosures: April 16, 2021
25

1 Filing discovery-related motions: April 23, 2021

2 Discovery deadline: May 14, 2021

3 Dispositive motions filed by: May 28, 2021

4 The parties agree all other deadlines should remain as scheduled.

7 DATED this 18th day of February, 2021.

9 RUIZ & SMART PLLC

10 COLE WATHEN LEID HALL PC

11 By s/Kathryn M. Knudsen

12 Isaac Ruiz, WSBA #35237

13 Kathryn Knudsen, WSBA #41075

iruiz@plaintifflit.com

14 knudsen@plaintifflit.com

15 Attorneys for plaintiff Romelia Perez

16 By:s/Elyse O'Neill

17 Rory W. Leid, WSBA #25075

18 William Weber, WSBA #28867

19 Elyse O'Neill, WSBA #46563

rleid@cwlhllaw.com

wweber@cwlhllaw.com

eoneill@cwlhllaw.com

20 Attorneys for Defendant

II. ORDER

Pursuant to the foregoing stipulation of the parties, the pre-trial dates are amended in accordance with the above stipulation. All other deadlines shall remain unchanged.

Dated this 22nd day of February, 2021.

Ricardo S. Martinez
RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

RUIZ & SMART PLLC

By *s/Kathryn Knudsen*
Isaac Ruiz, WSBA #35237
Kathryn Knudsen, WSBA #41075
iruiz@plaintifflit.com
kknudsen@plaintifflit.com

Attorneys for plaintiff Romelia Perez

Approved as to form:

COLE WATHEN LEID HALL, P.C.

By: *s/Elyse O'Neill*

Rory W. Leid, WSBA #25075
William Weber, WSBA #28867
Elyse O'Neill, WSBA #46563
rleid@cwlhlaw.com
wweber@cwlhlaw.com
eoneill@cwlhlaw.com

Attorneys for Defendant